

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
: :
MARTIN AND NICOLE CASEY : CASE NO. 5-17-02942
Debtors : CHAPTER 13

UFCW COMMUNITY CREDIT UNION :
a/k/a UFCW FEDERAL CREDIT UNION :

Movant, :

vs. :
MARTIN AND NICOLE CASEY :
Respondents. :

**DEBTORS' ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Martin and Nicole Casey, and files an Answer to UFCW
Community Credit Union's Motion for Relief From the Automatic Stay:

1. Martin and Nicole Casey, (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Charles J. DeHart, III, Esq. was appointed the Chapter 13 Trustee.
3. Under the Chapter 13 Plan, Debtor was to make regular monthly payments to the Movant outside of the Plan.
4. Movant alleges that Debtor has failed to make monthly car loan payments.
5. Debtor fell behind on payments to the Movant. Clients indicated that they will be in possession of funds needed to pay the loan off on or around April 22, 2019.
6. In the event there remains arrears, the Debtors wish to enter into a Stipulation to cure the arrears over a six month period.

7. Movant is not entitled to relief from the automatic stay as there is equity in the property encumbered by Movant's security interest, arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtors respectfully request that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: April 15, 2019

/s/Tullio DeLuca
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 15, 2019, he caused a true and correct copy of Debtor's Answer to UFCW Community Credit Union's Motion for Relief from the Automatic Stay to be served via electronic filing to the CM/ECF participant at the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

John Fisher, Esq. at fisherlawoffice@yahoo.com

Date: April 15, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esq.